1 2	SONAL N. MEHTA (SBN 222086) Sonal.Mehta@wilmerhale.com WILMER CUTLER PICKERING	kbau HAF	STA L. BAUGHMAN (SBN 264600) ghman@dhillonlaw.com RMEET K. DHILLON (SBN 207873)	
3	HALE AND DORR LLP 2600 El Camino Real, Suite 400		neet@dhillonlaw.com SE FRANKLIN-MURDOCK (SBN 339034)	
4	Palo Alto, California 94306	jfran	klin-murdock@dhillonlaw.com	
5	Telephone: (650) 858-6000		LON LAW GROUP INC. Post Street, Suite 700	
	ARI HOLTZBLATT (pro hac vice)	San	Francisco, California 94108	
6	Ari.Holtzblatt@wilmerhale.com MOLLY M. JENNINGS (pro hac vice)	Tele	phone: (415) 520-6593	
7	Molly.Jennings@wilmerhale.com WILMER CUTLER PICKERING	Atto	rneys for Plaintiff JOHN STOSSEL	
8	HALE AND DORR LLP 1875 Pennsylvania Ave, NW	THC	MAS R. BURKE (SBN 141930)	
9	Washington, DC 20006		nasburke@dwt.com	
10	Telephone: (202) 663-6000		DAVIS WRIGHT TREMAINE LLP	
10			505 Montgomery Street, Suite 800	
11	Allorneys for Defendant		an Francisco, California 94111-6533 elephone: (415) 276-6500	
10	META PLATFORMS, INC.	1 ele	phone. (413) 270-0300	
12		SEL	INA MACLAREN (SBN 300001)	
13			amaclaren@dwt.com	
1.4			GAIL ZEITLIN (SBN 311711)	
14			ailzeitlin@dwt.com	
15			IS WRIGHT TREMAINE LLP South Figueroa Street, 24th Floor	
1.6			Angeles, California 90017-2566	
16			phone: (213) 633-6800	
17				
18	Attorneys for Defendant S		rneys for Defendant SCIENCE FEEDBACK	
	IN THE UNITED STATES DISTRICT COURT			
19				
20	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
21	SAN JOSE DIVISION			
22	JOHN STOSSEL, an individual,		Case Number: 5:21-cv-07385-VKD	
23	Plaintiff,		LR 6-2(A) STIPULATION TO CONTINUE INITIAL CASE	
24	v.		MANAGEMENT CONFERENCE AND	
25	META PLATFORMS, INC., a Delaware corporation; SCIENCE FEEDBACK, a Frence	ch	[PROPOSED] ORDER	
26	non-profit organization; and CLIMATE FEEDBACK, a French non-profit organization			
27				
28	Defendants.			

Case 5:21-cv-07385-VKD Document 59 Filed 05/19/22 Page 2 of 4

1	Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff John Stossel, Defendant Meta		
2	Platforms, Inc. ("Meta"), and Defendant Science Feedback ¹ (collectively, the "Parties")		
3	respectfully submit this Stipulation to Continue Initial Case Management Conference. The		
4	stipulated request is supported by the accompanying declaration of Molly M. Jennings.		
5	WHEREAS, Plaintiff John Stossel filed the Complaint on September 22, 2021 (Dkt. No		
6	1);		
7	WHEREAS, Meta moved to dismiss the Complaint pursuant to Federal Rule of Civ		
8	Procedure 12(b)(6) and to strike the claims asserted against Meta pursuant to California		
9	anti-SLAPP statute on November 29, 2021 (Dkt. No. 27, "Meta's Motion");		
10	WHEREAS, Science Feedback moved to dismiss the Complaint pursuant to Federal Ru		
11	of Civil Procedure 12(b)(6) and to strike the claims asserted against Meta pursuant to California's		
12	anti-SLAPP statute on January 31, 2022 (Dkt. No. 50, "Science Feedback's Motion");		
13	WHEREAS, the Court held a hearing on both Meta's Motion and Science Feedback		
14	Motion on April 12, 2022 (Dkt. No. 58);		
15	WHEREAS, the initial Case Management Conference is currently scheduled for June 14		
16	2022 (Dkt. No. 53) and the Parties are required to meet and confer by May 24, 2022 (Dkt. No. 5		
17	WHEREAS, all discovery in this case is stayed as to all the Parties until the Court ha		
18	issued an order deciding both Meta's Motion and Science Feedback's Motion (Dkt. 48);		
19	WHEREAS, lead counsel for Science Feedback has two separate libel cases scheduled for		
20	argument in the Ninth Circuit at 1:00 p.m. on June 14, 2022;		
21	WHEREAS, the Parties agree that good cause exists to continue the initial Case		
22	Management Conference until the Court has issued an order deciding both Meta's Motion and		
23	Science Feedback's Motion;		
24	WHEREAS continuing the initial Case Management Conference until the Court has issued		
25	an order deciding both Meta's Motion and Science Feedback's Motion will not affect any oth		
26	date already set by Court order;		
27			
28			

1

¹ Erroneously sued as "Science Feedback and Climate Feedback."

Case 5:21-cv-07385-VKD Document 59 Filed 05/19/22 Page 3 of 4

1	IT IS HERERY STIPULATED AND AGRE	ED by the Parties that the initial Case	
2	IT IS HEREBY STIPULATED AND AGREED by the Parties that the initial Case Management Conference currently scheduled for June 14, 2022 shall be continued until a date		
3	convenient for the Court after it has issued an order deciding both Meta's Motion and Science		
4	Feedback's Motion.		
5			
6	DHI	LLON LAW GROUP INC.	
7	Dated: May 18, 2022 By:	/s/ Krista L. Baughman_	
8	Dated. 191ay 16, 2022	KRISTA L. BAUGHMAN	
9	Atto	rneys for Plaintiff John Stossel	
10			
11			
12	11	MER CUTLER PICKERING	
13		ALE AND DORR LLP	
14	By:	<u>/s/ Molly M. Jennings</u> MOLLY M. JENNINGS	
15	Atto	rneys for Defendant Meta Platforms, Inc.	
16			
17			
18	Dated: May 18, 2022 DAV	VIS WRIGHT TREMAINE LLP	
19	By:	/s/ Thomas R. Burke	
20		THOMAS R. BURKE	
21	Attor	rneys for Defendant Science Feedback	
22			
23			
24			
25			
26			
27			
28			
	2		

ATTORNEY ATTESTATION I, Molly M. Jennings, am the ECF User whose ID and password are being used to file this Stipulation and accompanying proposed order. In compliance with Civil Local Rule 5-l(h)(3), I hereby attest that concurrence in the filing of this document and all attachments has been obtained from each signatory. Dated: May 19, 2022 By: /s/ Molly M. Jennings Molly M. Jennings